

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
:
In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
:
:
-----X

**SECOND SUPPLEMENTAL AFFIDAVIT AND DISCLOSURE STATEMENT
OF ANDREW C. CORONIOS, ON BEHALF OF CHADBOURNE & PARKE LLP**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Andrew C. Coronios, being duly sworn, upon his oath, deposes and says:

1. I am a partner of Chadbourne & Parke LLP, located at 30 Rockefeller Plaza, New York, New York 10112 (the "Firm").

2. On March 9, 2010, I executed an Affidavit and Disclosure Statement (the "Affidavit") in support of Lehman Brothers Holdings Inc.'s ("LBHI") and its affiliated debtors' (together, the "Debtors") retention of Chadbourne & Parke LLP as ordinary course professionals to provide legal services to LBHI, in its capacity as successor Agent under the Amended Construction Loan Agreement (as defined in the Supplemental Stipulation, Agreement and Order Appointing Lehman Brothers Holdings Inc. as Agent under Loan Facility so order by the Court on February 23, 2010) (the "Kapalua Bay Agent Representation") and submitted that Affidavit and a completed Retention Questionnaire (the "Questionnaire") to the Debtors' bankruptcy counsel, to be filed with the Court in accordance with the procedures set forth in the

amended order entered March 25, 2010 authorizing the Debtors to employ professionals utilized in the ordinary course of business [Docket No. 7822]. The Debtors subsequently filed the Affidavit and Questionnaire with the Court on March 30, 2010 [Docket No. 7895].

3. On August 9, 2011 I executed a Supplemental Affidavit and Disclosure Statement (the "Supplemental Affidavit") that supplemented the Affidavit to reflect additional entities represented by the Firm in connection with the Debtors' chapter 11 cases. The Debtors subsequently filed the Supplemental Affidavit with the Court on August 17, 2011 [Docket No. 19323].

4. This affidavit supplements the previous Affidavit and Supplemental Affidavit. Since that time, the Firm has been retained by Brooke Financial Services, Ltd. ("Brooke") to represent it in the above-captioned bankruptcy cases. While Brooke holds interests adverse to the Debtors' estates, none of those adverse interests are with regard to the Kapalua Bay Agent Representation.

By: Andrew C. Coronios
Andrew C. Coronios, Partner

Subscribed and sworn to before me
this 6th day of October, 2011

Thomas A. Scott
Notary Public

THOMAS A. SCOTT
Notary Public, State of New York
No. 015C4792491
Qualified in Queens County
Certificate Filed in New York County
Commission Expires August 31, 2013